



NARRATIVE TELEVISION NETWORK

COMPANION RECORDING, INC.

5840 South Memorial Drive, Suite 312
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(918) 627-1000

February 23, 1996

Via Certified Mail -- Return Receipt Requested

Mr. William Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554

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Re: MM Docket No. 95-176

Dear Mr. Caton:

Please find enclosed the original and 12 copies of the Narrative Television Network's Response to the "Notice of Inquiry" in the above-captioned proceeding.

We would appreciate your filing the original and returning one copy stamped "filed" to us in the pre-addressed, stamped envelope enclosed.

The remaining 11 copies are for your use in distributing the appropriate copies within the Commission.

Thank you for your attention to this matter.

Sincerely,

Jim Stovall
President

Enclosures

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5+11

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEB 26 1996

In the Matter of)
)
Closed Captioning and Video Description) MM Docket No. 95-176
of Video Programming)

TO: The Commission

DOCKET FILE COPY ORIGINAL

**NARRATIVE TELEVISION NETWORK'S RESPONSE TO
NOTICE OF INQUIRY REGARDING VIDEO DESCRIPTION**

Introduction

The Narrative Television Network is writing in response to the Federal Communications Commission's request for comments in its "*Notice of Inquiry*," FCC 95-484, in the above-captioned proceeding, released December 4, 1995.

As a blind person myself, and as president of the Narrative Television Network ("NTN"), I both appreciate and applaud the FCC's involvement in accessible programming for visually impaired people.

NTN is a private corporation, founded in 1988, owned and operated by blind and visually impaired people. NTN has more background and experience in providing a wider range of accessible programming to the visually impaired community than anyone in the field of video description. A brief Fact Sheet has been attached, as "Exhibit 1," outlining the scope and nature of our work to date.

NTN has grown to include over 1,200 broadcast and cable affiliates, reaching 25 million homes in North America, and is carried in 11 foreign countries including Mexico, the Caribbean, Venezuela and New Zealand.

NTN has received numerous industry awards, including an EMMY, a MEDIA ACCESS AWARD from the television and movie industry, an INTERNATIONAL FILM AND VIDEO FESTIVAL AWARD, and a GOLDEN GEORGI, which is the top scriptwriting honor from The Writers Foundation of America. In addition, NTN is a Finalist for the 1996 BEACON AWARD from the Public Television Public Affairs Association for NTN's "Be a Visionary" campaign, a joint effort with the International Association of Lion's Clubs. Additionally, NTN has received numerous awards from other organizations that serve the blind and visually impaired community, including the 1996 ACCESS AWARD from the American Foundation for the Blind.

In 1994, and again in 1995, as a result of two separate cooperative agreements, NTN formed a public/private partnership through the U. S. Department of Education, allowing us to expand our already-successful and growing efforts to open the world of movies and television to the millions of visually impaired Americans.

NTN's comments regarding issues raised in the "*Notice of Inquiry*," as they relate specifically to video description, will cover the following subject areas:

1. Public Interest Benefits
2. Number of Individuals Who can Benefit
3. Availability of Video Description
4. Impact of Digital Technology
5. Cost of Video Description
6. Supply and Sources of Video Description Suppliers
7. Funding for Video Description
8. Market Incentives and Distribution of Video Description
9. Mandatory Video Description Regulations
10. Standards for Video Description
11. Parity with Closed Captioning

1. The Public Interest Benefits of Video Description

Since 1988, NTN has received feedback from thousands of blind and visually impaired people, their families, and the professionals who serve them. They report a number of various educational, socialization, informational, and entertainment benefits that accrue from narrated programming. Movies and television have been called the #1 recreational activity in our society. Visually impaired Americans, who already experience a vast separation from the mainstream of our culture, face a broad extension of this separation if they do not have reliable and dependable access to the education, socialization, information, and entertainment provided by television.

Rehabilitation teachers and those dealing with the learning disabled have reported what we call “secondary benefits” of narrative programming (those benefits experienced by other than visually impaired people).

Over 60 percent of NTN’s audience mail nationally comes from fully sighted people who simply enjoy the programming. They report being able to do other things around the house while watching television, or find it an enjoyable way to experience the programming. We feel that this segment of the audience is particularly important because they become aware and sensitized to the challenges faced by blind and visually impaired people.

2. Number Of Individuals Who Can Benefit From Video Description

We anticipate that the number of visually impaired people is greater than reported by the Census Bureau. We have been in communication with many audience members, particularly the elderly, who did not necessarily consider themselves visually impaired. They simply felt that not being able to see television was a normal part of the aging process. For this reason, we feel that there are many more visually impaired Americans who will benefit from narrated programming than would be reflected in the current data. Given this growing segment of visually impaired

Americans, along with the “hidden visually impaired” (those needing narration, but not necessarily considering themselves visually impaired), as well as the many secondary benefits of accessible programming, the demand and need for video description is very great.

NTN has conducted our own in-house network surveys of our audience and, through the U. S. Department of Education, we are in the midst of a three-year television industry study with Nielsen Media Research. The Nielsen study is designed to survey the entire visually impaired population using accepted entertainment industry criteria to determine their viewing habits, preferences and demand for narrated television and movie programming.

3. Availability Of Video Description

NTN is presented on over 1,200 broadcast and cable affiliates, reaching 25 million homes in the United States. NTN has distribution relationships with Nostalgia Television, Kaleidoscope, multi-system operators and many independent affiliates. NTN programming sources include MCA Universal, World Vision, Viacom, King World, Four Star, Nostalgia, and Kaleidoscope. In addition to its openly narrated distribution (no special equipment required) via broadcast and cable, NTN, through its distribution relationship with Nostalgia Television, currently provides accessible movies and television programming via an unscrambled satellite signal to the millions of C-Band dish owners across the United States.

NTN is currently in the last stages of finalizing production and distribution agreements with Direct Broadcast Satellite providers. These arrangements will, for the first time, make narrated programming potentially available to any home in the United States. The DBS programming will include openly narrated NTN programming currently available through cable, broadcast, and satellite outlets, as well as provide digitally delivered closed narration (available on-demand via speaker or earpiece) for virtually any network, cable, or pay-per-view programming.

NTN is continuing to develop relationships with telephony providers. The digital delivery of accessible programming is obviously the future of the industry. Once produced and mastered, it can be delivered in a myriad of formats through broadcast, cable, telephone, satellite, etc.

A large number of households do not have access to stereo TVs or VCRs, so they are unable to access the SAP channel. Of even greater concern is the fact that, in most areas of the country, broadcast programming is received via cable, and a great number of cable operators cannot, or do not, pass along the SAP signal. We at NTN do not necessarily believe that SAP is the permanent answer to accessible programming for blind and visually impaired people. The only successful commercial application of SAP is for Spanish language translations, and the demand for language translations for programming will continue to grow in the future, placing increased demands on the SAP channel. We feel that the only permanent, realistic, and reasonable solution for accessible programming lies in digital technology with a digital delivery system. This will offer the widest number of distribution possibilities, as well as the greatest flexibility as the information superhighway and associated technology expands and evolves.

4. Impact Of Digital Technology On Video Description

As described above, a digital signal, whether delivered through fiber optic cable, DBS, telephony, etc., is the future of video description, or narration, being available for the millions of blind and visually impaired Americans. This technology allows us to “marry” a narrative soundtrack to any television or movie video programming in such a way that it can be delivered through each one of the growing and expanding distribution methods. Digital audio is readily available and takes up very little bandwidth capacity. A number of audio options can be offered with every video program, including various language translations, as well as the video description, or narration, soundtrack for the visually impaired. Since the digitally mastered

narrative track can be perfectly synched to the video signal, the possibility of delivering video description through a stand-alone delivery system exists. The possibilities offer a whole new world to blind and visually impaired people, if accommodations are made at the outset. If these accommodations are not initially made, a retrofit may be extremely costly and difficult, if not impossible.

5. Cost Of Video Description

The cost of video description, or narration, has been greatly overstated by a number of sources. Since 1988, NTN, as a for-profit commercial network, has produced more accessible programming for the visually impaired population than anyone in the field. NTN can provide the highest-quality narrative programming for \$1,000 to \$1,200 per program hour. This variance is due to the video format used, the quantity of work to be completed, and the type and nature of the programming to be made accessible.

As an organization owned and operated by blind and visually impaired people, we have long recognized that the practical and commercial viability of narrated programming lies in providing video description at a cost and turnaround time comparable to captioning. We have met these goals, and continue to produce the highest-quality, proven production work under these cost and time constraints. The figures stated above, \$1,000 to \$1,200 per program hour, are not a theory. NTN has consistently met these cost goals and has created a profitable, commercial, tax-paying entity in doing so. Every indication is that the expansion of digital technology will bring these costs down further, and shorten the turnaround time required.

6. Supply and Sources Of Video Description Suppliers

As a blind person myself and as president of the Narrative Television Network which is a commercially viable, for-profit corporation, and has successfully and profitably provided

accessible programming since 1988, I am concerned by the statement in the “*Notice of Inquiry*,” or by anyone else, that Descriptive Video Service is the “primary” source of accessible programming. NTN has, to date, provided more hours of accessible programming, with a wider variety of types and distribution of programming than anyone in the field. This has been accomplished profitably, efficiently, and at a lower cost than anyone else in the field. NTN has been providing this service longer and more consistently than anyone else, and has received more awards, and sought and received more industry feedback, ensuring the effectiveness and the quality of our work, than anyone else. As a blind person myself, I applaud and respect the work done by WGBH’s Descriptive Video Service, although it is not now, nor has it ever been, available anywhere in my state. We have had a good working relationship with WGBH, and cooperated successfully in many areas and on many occasions. However, to call Descriptive Video Service the “primary” or even the “leading” entity in this field is unfair to the blind and visually impaired people who own and operate NTN, and the dedicated and award-winning professionals that, since 1988, have provided the most and best access for blind and visually impaired people, profitably and more efficiently, and at a lower cost than anyone in the country.

7. Funding For Video Description

NTN began operations in 1988 and was funded privately by a group of blind and visually impaired people who were willing to invest their own time and money to make accessible television and movie programming a reality. This initial capitalization, along with revenue from networks licensing NTN programming, commercial advertisers and sponsors, as well as production fees from networks for whom NTN produces narrated programming, were the sole source of revenue for the growth, expansion, and success of NTN, until late 1994. In late 1994, and again in late 1995, NTN began receiving funding from the U. S. Department of Education, which has enabled us to grow and expand in ways that budgetary constraints would not allow

prior to 1994. While we believe, and have proven, that narrated programming is wanted, needed, and is economically viable on a commercial, for-profit basis, we believe it will require seed funding from public sources for an initial period, so that this effort can reach a critical mass of supply and demand.

8. Market Incentives and Distribution of Video Description

NTN programming has been distributed via satellite, cable and broadcast. The majority of NTN audience members receive our programming via basic cable. However, we have received some indications that the availability of NTN will cause non-cable-subscribing visually impaired people to subscribe to basic cable. Throughout Canada, NTN is available on the Family Channel, which in Canada is a premium service comparable to the Disney Channel in the U. S. There are some similar indications that visually impaired patrons would be more inclined to subscribe to a premium service when narrated programming is available.

9. Mandatory Regulations For Video Description

Any educational or entertainment programming distributed via public or regulated delivery systems should be reasonably made accessible to visually impaired Americans. The field of video description and the regulations and requirements should ideally mirror those of captioning, therefore requiring one standard for accessibility. As visually impaired people ourselves, we do not wish to place undue hardships on studios, broadcasters, cable systems, or anyone involved in the industry. NTN has grown to include over 1,200 broadcast and cable affiliates, and we enjoy ongoing relationships with producers, studios, advertisers, broadcasters, and cable networks. None of these relationships have come about due to regulations or mandates, but instead, these entities have understood the wisdom of increasing their audience and distribution, as well as providing positive publicity and goodwill. However, for the field of

video description to reach its promise and achieve a level of accessibility equal to captioning, mandates and regulations will be required. Mandates must be reasonable because, when properly handled, the industry will experience a win/win environment when it is accessible to the millions of visually impaired Americans, and their families.

As stated above, video description regulations for producers and distributors must be reasonable, and should mirror those of captioning. A whole new world of education, socialization, and entertainment can be opened to visually impaired people without creating any undue hardships on the production or distribution industry. Narration can be provided in a time frame and for costs equivalent to captioning, and the need for accessibility of the visually impaired is at least as great as that of the deaf and hard of hearing

10. Standards For Video Description

Technical and quality standards must be set; however, many of the quality standards can be driven by the marketplace. The field of video description, or narration, is much more subjective than that of captioning. There are many ways to describe the visual elements of video programming. NTN, through its seven years of experience, with feedback from thousands of audience members from across the country, as well as with input from its Consumer Advisory Board, is continually developing and perfecting our narrative script style and delivery. We would be concerned about any regulations that would place undue burdens on this evolving creative process of making television and movies accessible. NTN, through the Department of Education, is in the midst of a three-year study of the desires, preferences, and viewing habits of visually impaired Americans, conducted by Nielsen Media Research. All of this ongoing research and input enables us to constantly update and improve our standards. Regulations must be broad enough to ensure accessibility without creating barriers to the future growth and development of the narrative medium.

11. Parity With Closed Captioning

We at NTN have viewed, and continue to view, the issue of video description, or narration, as one of parity with captioning. An active and aggressive program of making television and movies accessible to the visually impaired population must be initiated quickly. There is already a wide disparity between video description and closed captioning, and the gap is increasing every day. Not only does current movie and television programming need to be narrated, but there is an incredible backlog that must be made accessible in order to include visually impaired Americans and their families in the exploding communications revolution.

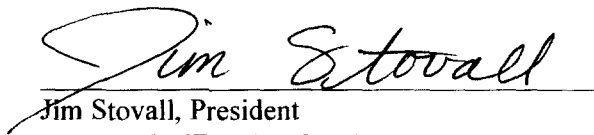
With the cost of narrated programming and the turnaround time comparable to captioning, it is reasonable to expect broadcasters and other distributors to provide video description at least as frequently as captioning is provided. The “ramp-up” time for bringing narration into parity with captioning must be aggressive so that the gaps do not widen, and the backlog of programming does not grow larger.

Conclusion

As blind and visually impaired people who own and operate the Narrative Television Network, this is not simply our profession nor our business, but this is a vital part of our lives. We have invested our own money, time, effort, and energy for the last seven years to make NTN a reality. Our successes to date only serve to point out the fact that there is a huge need and demand for accessibility among the millions of visually impaired Americans and their families. We are at your service in any way, and to any extent possible, in order to provide the information and input necessary to make quality decisions and appropriate policies to serve the visually impaired population.

As a blind person myself, it would be impossible to adequately articulate the plight of blind and visually impaired people. However, I trust we will have the opportunity to discuss this further, and to work together to provide a brighter tomorrow for blind and visually impaired Americans.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jim Stovall". The signature is written in dark ink and is positioned above a horizontal line.

Jim Stovall, President
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Suite 312
Tulsa, Oklahoma 74145-9082
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Dated: February 23, 1996



NTN **NARRATIVE TELEVISION NETWORK**

COMPANION RECORDING, INC.

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NTN makes television, home videos and movies accessible for millions of blind and visually-impaired Americans and their families.

NTN unobtrusively adds the voice of a narrator to the existing programming sound track, without interfering with any of the original audio or video.

NTN launched in 1988, and has grown to include over 1,200 broadcast and cable affiliates, reaching 25 million homes in North America.

NTN has received an **EMMY** Award, a **MEDIA ACCESS** Award from the television and movie industry, an **INTERNATIONAL FILM AND VIDEO** Award, and a **GOLDEN GEORGI**, which is the top script-writing honor from The Writers Foundation of America.

NTN was designed to open the world of television to blind and visually-impaired Americans and their families. However, 60% of NTN's audience is made up of fully-sighted people who simply enjoy the programming.

NTN programming consists of a talk/interview show, followed by a narrated movie. Guests who have appeared on NTN include Katharine Hepburn, Jack Lemmon, Helen Hayes, Eddie Albert and Douglas Fairbanks, Jr., among many other of Hollywood's biggest stars.

NTN is available throughout the United States on Nostalgia Television and Kaleidoscope, and throughout Canada on the Family Channel. NTN is also carried on many independent broadcast and cable affiliates, as well as eleven foreign countries.

NTN is available throughout North America via its unscrambled satellite signal on Hughes G-1, Transponder 22, in addition to its broadcast and cable affiliates.

NTN programming is available seven days a week, and provides over 20 hours of accessible programming each week.

NTN has enjoyed positive publicity, including features on **CNN**, **Good Morning America**, and in **TV Guide**.

NTN programming has attracted significant advertisers, including **K-Mart**, **Sears** and **AT&T**, among many others.

NTN requires no special equipment and is a part of regular broadcast programming or basic cable in most parts of North America.

NTN also makes live theatre and other special events accessible, via a wireless receiver, for the blind and visually-impaired community, such as the Tony Award-winning Broadway show, "**The Will Rogers Follies**."

NTN receives major funding from the U. S. Department of Education.

NTN offers a free Program Guide to anyone who writes requesting one from the Network.